

**EXHIBIT L**

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May 22, 2023

Levy Konigsberg LLP  
c/o Moshe Maimon  
605 Third Avenue, 33rd Floor  
New York, NY 10158

Re: In re LTL Management LLC, Case No. 23-12825 (MBK) – Discovery Deficiency

Dear Counsel:

On behalf of the Debtor, LTL Management, LLC, I am writing in regards to (a) Levy Konigsberg's failure to respond to the Debtor's First Set of Interrogatories to Levy Konigsberg LLP and Levy Konigsberg LLP Acting for Levy Konigsberg Talc Claimants and (b) the various deficiencies in Levy Konigsberg's *Response of Levy Konigsberg LLP to Subpoena*. We request to meet-and-confer with you no later than Tuesday, May 23, 2023, to determine whether the parties may resolve these concerns absent motions practice.

#### Interrogatories

The Debtor does not have record of Levy Konigsberg responding to Debtor's First Set of Interrogatories to Levy Konigsberg and Levy Konigsberg acting for Levy Konigsberg Talc Claimants. Your email of May 15, 2023, indicates that Levy Konigsberg would not be responding to the Debtor's interrogatories. Please confirm that Levy Konigsberg does not intend to provide the Debtor with responses and/or objections.

#### Requests for Production of Documents

##### A. *Request Nos. 1-13*

Request Nos. 1-13 ask Levy Konigsberg to provide documents and/or communications relating to the number of Levy Konigsberg Talc Claims, settlement or statutory demands that Levy Konigsberg has made, the amount that Levy Konigsberg believes is adequate compensation for any or all Levy Konigsberg Talc Claims, estimates of potential liability in different scenarios and to different claimants or entities, estimates of the number of future Talc Claims, the Plan Support Agreements, and financing secured by levy Konigsberg's contingency fees on Talc Claims. Your answer, in part, objects on privilege grounds.

JONES DAY

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Per D.N.J. LBR 7026-1, “[w]hen a party asserts a claim of privilege in response or objection to a discovery request, the party must identify the nature of the privilege claimed and indicate whether with respect to the privilege (i) any document exists, or (ii) any oral communication occurred.” Levy Konigsberg’s responses to Request Nos. 1-13 each fail to (a) assert the basis for each claim of privilege, (b) indicate whether or not responsive documents exist that are being withheld based on the alleged privilege, and (c) indicate whether any responsive oral communications occurred that the substance of which is being withheld based on the alleged privilege.

Accordingly, the Debtor asks that Levy Konigsberg supplement its responses to Requests Nos. 1-13 to provide the basis for its privilege claims, indicate whether any responsive documents or communications exist, or indicate whether any oral communications occurred.

As noted, we would like to meet-and-confer not later than Tuesday, May 23, 2023, to address the above issues. Please provide dates and times when you are available. We reserve the right to compel Levy Konigsberg to supplement their responses to any interrogatory and request for production if Levy Konigsberg learns additional information during the discovery process that impacts any response.

Sincerely,

/s/ Katie L. Wall

Katie L. Wall

cc: Gregory M. Gordon  
James M. Jones  
David S. Torborg  
Brad B. Erens  
Dan B. Prieto  
Mark W. Rasmussen